

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

**IN RE: REAGOR-DYKES MOTORS,
LP ET AL.,
Debtor.**

[Decorative flourish]

Case No. 18-50214-RLJ-11
Chapter 11

**DENNIS FAULKNER, TRUSTEE OF
REAGOR-DYKES AUTO GROUP
CREDITORS LIQUIDATING TRUST,**
Plaintiff,
v.

Adversary Proc. No. 20-05039-RLJ

AIMBANK,
Defendant.

DECLARATION OF TRACY BECHEN

My name is Tracy Bechen. I have never been convicted of a felony or a crime of moral turpitude. I am in all ways competent to make this declaration. Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am currently employed as a Business Systems Product Manager, VP for Heartland Financial USA, Inc. (“HTLF”), which is the parent company of First Bank & Trust, formerly known as AimBank. The facts set forth in this declaration are within my personal knowledge and true and correct.

2. I have been employed by HTLF for 27 years. During this time, I have worked primarily in the Deposit Operations area, and recently began working in the Loan Operations area. I have been involved in the mergers and acquisitions for systems conversions throughout my tenure with HTLF.



3. In February of 2022, I was asked to assist with locating any kite reports and deposit items relating to the Reagor-Dykes matter that may be accessible to AimBank that had not already been identified.

4. With respect to the deposit items, from my experience in banking operations and mergers/acquisitions, I knew that the pre-merger deposit items would be stored in a retention platform called OmniView. OmniView is a third-party platform that HTLF uses to ingest and retain data from banks that its subsidiaries have merged with or acquired.

5. As part of my efforts in locating kiting reports, I had a conversation with Debbie Smith, a branch manager for First Bank & Trust, formerly known as AimBank.

6. During this conversation, I was shown a document titled “Kite Suspect Report – Daily Analysis”. I noticed that this document had “OPTICAL-Synergy” in the upper left-hand corner. A redacted example is attached to this declaration as Exhibit 1.

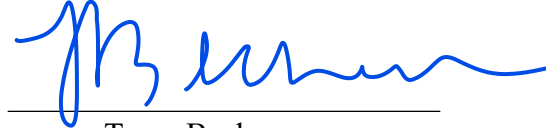
7. From my experience in banking operations and mergers/acquisitions, I understood that “OPTICAL-Synergy” signified that this report had been run from a third-party banking application called Synergy. I also knew, based on my experience, that reports run in Synergy would not be stored in shared drives or file servers, but rather in OmniView.

8. Based on this information, I checked OmniView for reports like the “Kite Suspect Report – Daily Analysis” to see if there were others. I found these same reports for March 9, 2018 through the present. I conducted a diligent search in OmniView for kite reports for the period of January 1, 2017 through March 8, 2018, but was unable to locate any such additional reports.

[Remainder intentionally left blank]

I, Tracy Bechen, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the above and foregoing is true and correct.

Signed on this, the 8th day of March 2022.

A handwritten signature in blue ink, appearing to read 'Tracy Bechen', is written over a horizontal line.

Tracy Bechen

OPTICAL-Synergy
AimBank

KITE SUSPECT REPORT

7/02/18 1:40AM 006655P PAGE 9

DAILY ANALYSIS

Mls

ACCOUNT NO.	YEST. COLLECTED	DEBITS	NO. OF	DEP	# OF	BALANCE	DATE	-----TIMES-----ON
NAME	FLOAT	CREDITS	CG-BKS	DAYS	DEPS	KITE BAL.	OPENED	CY

